

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF TEXAS

LAREDO DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	CR. NO. 5:17-CR-00560
	§	
ADRIANA ALEJANDRA GALVAN-	§	
CONSTANTINI, ET AL.	§	

**GOVERNMENT’S SUPPLEMENTAL BRIEFING PURSUANT TO COURT’S ORDER  
AT DECEMBER 11, 2018 PRE-TRIAL HEARING**

At the December 11, 2018 hearing, the Court asked counsel for the Government and the Defendants to provide the Court additional briefing on certain topics. The Government’s recollection is that the Government was to: (i) identify the bases for admissibility of the audio and video recordings identified in its Exhibit List; (ii) brief the Court on “consciousness of guilt”; (iii) supplement the Government’s notice of expert testimony; (iv) provide additional support for admissibility of Government’s Exhibits 377-383 (Certification of Lack of Record forms related to Defendants Galvan-Constantini and Montes-Patiño); (v) redact unnecessary transactional information contained in Government’s Exhibits 385B (bank account records related to Defendants Galvan-Constantini and Montes-Patiño); and (vi) redact unnecessary information in Government’s Exhibit 117 (forfeiture certification documents). Responses covering (i) through (iv) above are attached to this filing. As for (v) Exhibit 385B, the Government will withdraw every page except pages 5-9, 32, 33, 35, 76, and 78, which also have been redacted to show only transactions relevant to the Government’s case (redacted pages have been emailed to defense counsel), and as for (vi) Exhibit 117, the Government will withdraw

pages 1-12, keeping only pages 13-23 (which show notice of the forfeiture action and that no claim was filed to recover the seized property).

Finally, upon further reflection to the Court's inquiry at the December 11 hearing about additional potential issues, also attached is a Motion to Prohibit Certain References at Trial and a corresponding proposed order.

Respectfully submitted,

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#### **CERTIFICATE OF SERVICE**

I hereby certify that on December 14, 2018, a true and correct copy of the Government's Supplemental Briefing Pursuant to Court's Order at December 11, 2018 Pre-Trial Hearing was electronically filed with the Clerk of the Court using the CM/ECF System, which will transmit notification of such filing to all Counsel of Record.

/s/ Keith Liddle  
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